Hearing Date: September 27, 2007

Time: 10:00 am

Objection Deadline: September 20, 2007

Time: 4:00 pm

## **BUCHANAN INGERSOLL & ROONEY PC**

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William H. Schorling, Esq. (WS-6322) DeWitt C. Brown, Esq. (DB-5720)

Attorneys for Arkema Inc.

UNITED STATES BANKRUPTCY COURT		
SOUTHERN DISTRICT OF NEW YORK		
	X	
	:	Chapter 11
In re:	:	
	•	Case No. 05-44481 (RDD)
DELPHI CORPORATION, et al.,	:	
	:	(Jointly Administered)
Debtors	•	,

## NOTICE OF HEARING OF MOTION OF ARKEMA INC. FOR LEAVE TO FILE LATE CLAIM

PLEASE TAKE NOTICE, that upon the attached motion (the "Motion") of Arkema ("Arkema") For Leave to File Late Claim, by and through its counsel, Buchanan Ingersoll & Rooney PC, Arkema will move before the Honorable Robert D. Drain, in his courtroom located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, Room 610 at 10:00 a.m. on September 27, 2007 or as soon as counsel may be heard (the "Hearing"), for the entry of an Order permitting Arkema to file a late proof of claim in the above-captioned Chapter 11 Cases and awarding such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure, the Local Rules of Bankruptcy Court for the Southern District of New York, and the Amended Eighth Supplemental Order Under 11 U.S.C. §§102(1) and 105 and Fed.R.Bankr.P.2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management, and Administrative Procedures, entered by this Court on October 26, 2006 (the "Amended Eighth Supplemental Case Management Order") (Docket No. 5418), (c) shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (as amended), by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format, (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon, (i) Buchanan Ingersoll & Rooney PC, One Chase Manhattan Plaza, 35th Floor, New York, NY 10007 (Attn: William H. Schorling), (ii) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Attn: General Counsel); (iii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, IL 60606 (Attn: John Wm. Butler, Jr., (iv) counsel for the agent under the post-petition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Attn: Donald Bernstein and Brian Resnick), (v) counsel for the Official Committee of Unsecured Creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Attn: Robert J. Rosenberg and Mark A. Broude), (vi) counsel for the Official Committee of Equity Security Holders, Fried, Frank, Harris, Shriver & Jacobson LLP, One New York Plaza, New York 10004 (Attn: Bonnie Steingart) and (vii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Attn: Alicia M. Leonhard) in each case so as to be received no later than 4:00 p.m. (Prevailing Eastern Time) on September 20, 2007 (the "Objection Deadline").

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PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein

and in accordance with the Amended Eighth Supplemental Case Management Order will be

considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed

and served in accordance with the procedures set forth herein and in the Amended Eighth

Supplemental Case Management Order, the Bankruptcy Court may enter an order granting the

Motion without further notice.

DATED: September 7, 2007

Respectfully submitted,

**BUCHANAN INGERSOLL & ROONEY PC** 

/s/ DeWitt C. Brown

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